

REMARKS/ARGUMENTS

Applicant would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and the following comments are submitted for Examiner's consideration.

Claims 1, 5, 7 and 9 were rejected under 35 U.S.C. 103 (a) over U.S. Patent No. 2001/0026260 to Yoneda et al. (hereinafter "Yoneda") in view of U.S. Patent No. 6,211,854 to Fujiyoshi (hereinafter "Fujiyoshi"). For the following reasons, the rejection is respectfully traversed.

As acknowledged in the Office action, Yoneda does not teach sequential scanning when a movie display is performed, and thus Fujiyoshi has been cited as rendering the limitation obvious. Applicant respectfully submits that, as previously explained, Yoneda *teaches away* from the claimed invention. Yoneda explains at paragraph [0113] that "When a motion picture or inputted letters are to be displayed, *it is preferred to select* a driving method according to *interlace* scanning," while the present claims require sequential scanning when movie display is performed.

Further, as explained by Yoneda at [0021], its teachings relate to liquid crystal displays that have a memory effect (i.e. bistable liquid crystals) so that power is not required during static image display. Yoneda teaches that an interlace display is used when high-speed writing is needed (e.g. during motion picture display), which not only increases the refresh rate, but provides a more stable or flicker-free image since the memory effect of the liquid crystal causes the interlaced scan lines that are not being currently written to continue displaying (see

paragraphs [0021] and [0022]). If the teachings of Yoneda were modified to select sequential scanning during motion picture display, it would not only slow down the display, but it would completely defeat the flicker-reduction effect realized by Yoneda's invention. Thus, for this additional reason, Yoneda clearly teaches away from the claimed invention.

Even further, the Office action states that the teachings of Fujiyoshi relating to power savings at col. 2, lines 11-12 provide motivation for modifying Yoneda's teachings to use sequential scanning during movie display is performed. However, as described in paragraph [0021], Yoneda already achieves significant power reduction through the use of liquid crystal that exhibits the above-described memory effect: "once writing of an image on the liquid crystal display is completed, the display is capable of displaying the image continuously even after the supply of electric power thereto is stopped, which means the liquid crystal display consumes little electric power" (see paragraph [0021], lines 6-10). Further, as will be appreciated by one of ordinary skill in the art, applying the teachings of Fujiyoshi to the liquid crystal of Yoneda, the power-related advantages of using a liquid crystal that exhibits a memory effect would be negatively impacted. Accordingly, it is clear that Fujiyoshi's teachings related to power-reduction would not have motivated one of ordinary skill to modify Yoneda to select sequential scanning when movie display is performed as required by the present claims.

For all of the above reasons, the use of sequential scanning during movie display is in direct contradiction to the preferred modes of operation described in Yoneda, even in view of the teachings of Fujiyoshi. Accordingly, a *prima facie* case of obvious cannot be established based on the teachings of Yoneda in view of Fujiyoshi and the rejection should be withdrawn.

Claim 4 was rejected under 35 U.S.C. 103 (a) over Yoneda in view of Fujiyoshi and in further view of U.S. Patent Application Publication No. 2003/0013484 to Nishimura (hereinafter “Nishimura”). For the following reasons, the rejection is respectfully traversed. Claim 4 depends from claim 1. As described above, the claimed use of sequential scanning when a movie display is performed is nonobvious over Yoneda in view of Fujiyoshi because, *inter alia*, Yoneda teaches away from such operation. Therefore, even if the teachings of Yoneda, Fujiyoshi and Nishimura were combined, it would have been nonobvious to arrive at the claimed invention.

Claim 8 was rejected under 35 U.S.C. 103 (a) over Yoneda in view of Fujiyoshi and in further view of U.S. Patent Application Publication No. 2003/0137521 to Zehner (hereinafter “Zehner”). For the following reasons, the rejection is respectfully traversed. Claim 8 depends from claim 1. As described above, the claimed use of sequential scanning when a movie display is performed is nonobvious over Yoneda in view of Fujiyoshi because, *inter alia*, Yoneda teaches away from such operation. Therefore, even if the teachings of Yoneda, Fujiyoshi and Zehner were combined, it would have been nonobvious to arrive at the claimed invention.

Claim 10 was rejected under 35 U.S.C. 103 (a) over Yoneda in view of Fujiyoshi and in further view of U.S. Patent No. 6,307,681 to Aoki (hereinafter “Aoki”). For the following reasons, the rejection is respectfully traversed. Claim 10 depends from claim 1. As described above, the claimed use of sequential scanning when a movie display is performed is nonobvious over Yoneda in view of Fujiyoshi because, *inter alia*, Yoneda teaches away from such operation. Therefore, even if the teachings of Yoneda, Fujiyoshi and Aoki were combined, it would have been nonobvious to arrive at the claimed invention.

In consideration of the foregoing analysis, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No.: NGB-40221.

Respectfully submitted,

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